

JUL 17 1997

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

CC Docket # 96-98
[REDACTED]

In the Matter of)
)
Request by ALTS for Clarification) CCB/CPD 97-30
of the Commission's Rules Regarding)
Reciprocal Compensation for Information)
Service Provider Traffic)
)

COMMENTS OF THE
COMMERCIAL INTERNET EXCHANGE ASSOCIATION

The Commercial Internet eXchange Association ("CIX"), by its attorneys, files these comments in support of the Association for Local Telecommunications' June 20, 1997 request for expeditious clarification (the "ALTS Request"). CIX is a non-profit organization that operates to facilitate global connectivity among commercial Internet service providers ("ISPs") in the United States and throughout the world. These comments represent the views of CIX as a trade organization and may not reflect the views of the individual members. A CIX membership list is attached hereto.

CIX supports the ALTS Request because it would enhance competition among providers of local telecommunications services to the benefit of all end-users, including Internet providers and their customers. By stimulating competition for telecommunications services, reciprocal compensation arrangements among local carriers allow Internet providers and their customers to choose the least cost/highest quality telecommunications available to access the Internet. In


contrast, the refusal to abide by reciprocal compensation obligations¹ harms local telecommunications competition by excluding a significant segment of end-users from the telecommunications services offered by new entrants; without any compensation for termination of traffic originated from incumbent LEC, there is little reason for any CLEC or CAP to serve an ISP. Likewise, lack of reciprocal compensation causes the ISPs to rely exclusively on the telecommunications services offered by the incumbent LEC. Given this, CIX supports the ALTS' Request.

CIX looks forward to reviewing the comments filed in this proceeding, especially those of the incumbent LECs, and will respond fully in its reply comments.

Respectfully submitted,

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¹ 47 U.S.C. § 251(b)(5).



Commercial Internet eXchange Association Members July 1997

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Internet Initiative Japan (IIJ)
Internet ProLink SA
Internet Public Access Corp.
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MIND (Mitsubishi Electric Network
Information Co.)
Minnesota Online
Nasamar Data Communications GmbH
NEC Corporation
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Affiliated Associations:
London Internet Exchange (LIXX)
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